



COPY

Chevron Products Company
Marketing Business Unit
2300 Windy Ridge Parkway
Suite 575 South
Atlanta, GA 30339

June 9, 2008

The Honorable George Hawkins
Director
District of Columbia Department of the Environment
51 N Street NE, 6th Floor
Washington, DC 20002

Dear Director Hawkins:

I am writing in response to your letter of May 7, in which you request copies of chromatograph indoor air data archived by Chevron's laboratory contractor, Air Toxics, which may identify compounds other than gasoline-range organics (GROs) originally analyzed in the Riggs Park neighborhood of the District of Columbia.

The attached letter from Air Toxics reinforces concerns Chevron earlier had raised concerning the reliability and utility of this data. Nonetheless, Chevron has directed Air Toxics to generate the requested data from its archives, and will fund the work as part of our continuing effort to assist the District Department of the Environment (DCDOE) as you respond to public health concerns in the Riggs Park neighborhood of the District. Chevron will forward the resulting data once we receive it from the lab. We anticipate receiving the data within approximately 3 weeks.

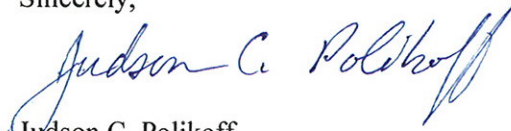
Chevron's willingness to fund additional work beyond the scope of approved work plans, and beyond the scope of the measures required under USEPA's Final Decision and Response to Comments for the former Chevron facility in Chillum, has been premised on the assumption that the District's broader data-gathering and investigative work is unrelated to the risks presented by the groundwater plume, as is evident in the request for data on non-GRO compounds. Chevron has not had any involvement in that broader effort, has not been offered an opportunity to provide input on the scope or design of these ongoing studies, and was not asked to perform or fund the work prior to the award of contracts under the District's public procurement process. In addition, as you are aware, Chevron considers these studies – to the extent Chevron has been able to discern their scope and purpose from public documents – duplicative and unnecessary for determining the risk and remedial action for the neighborhood. This is particularly evident to us in light of USEPA's exhaustive work in the Riggs Park neighborhood and the additional measures USEPA has required of Chevron to respond to the District's articulated concerns. Accordingly, Chevron is expecting that these study costs are not being considered eligible for cost-recovery under federal or District statutes.

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We would welcome a meeting with you to discuss these issues, and to consider what other assistance Chevron might provide to you.

We look forward to presenting you with the request available as soon it becomes available to us.

Sincerely,

A handwritten signature in blue ink that reads "Judson C. Polikoff". The signature is fluid and cursive, with a large initial "J" and a stylized "P".

Judson C. Polikoff
Assistant Secretary
Chevron U.S.A. Inc.

cc: Bicky Corman, General Counsel



180 Blue Ravine Road, Suite B Folsom, CA 95630

April 4, 2008

Mr. Robert Scrafford
Environmental Scientist/Engineer
Gannett Fleming, Inc.
4701 Mt. Hope Drive, Suite A
Baltimore, MD 21215

Dear Mr. Scrafford,

In response to your request, we have detailed the process as well as cost and quality implications associated with reissuing a set of workorders generated for the Chevron Chillum site. The original reports submitted to Gannett Fleming were limited to a subset of project-specified target compounds. These compounds were communicated to Air Toxics by Gannett Fleming during project set-up. The reissued workorders would provide the results for the full 60-compound standard TO-15 list. The reports identified by Gannett Fleming for possible reissue are summarized in Table 1.

Table 1. Targeted workorders for reissue

Workorders
0706078
0706171R1
0706204R1
0504479
0505004R1
0505170
0505331
0505483
0506168
0506299
0507269

Reissue Process

As per Air Toxics' procedures, samples are disposed after the sample results are verified against laboratory and project specifications at the time of analysis. However, it is Air Toxics' policy to archive all electronic data records for a minimum period of five years. The archived data records include the sample results provided to our clients as well as all of the complete raw data used to generate these results. To reissue the workorders, the GC/MS instrument data files from the samples and QC runs are restored to the processing software (Target Thru-put) from the data archives. The data files contain the calibration table for the full list of compounds, the raw mass spectra and peak information acquired by the GC/MS for each run, as well as the processed data files used for the original report. Because the Gannett Fleming data files were processed and



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reviewed for project-specified subset of compounds only, these data files require re-processing for the full list of calibrated compounds. None of the original data files are over-written in the reissue process. The re-processed files have a unique file extension "r #" to indicate the revision and the version. The re-processed data undergoes the same review process as the original report. This includes evaluation of each target compound in the samples, evaluation of the QC samples against laboratory requirements, narration and qualification of non-compliant quality control, review of final report by senior staff, and approval of re-issued report by QA Manager or Technical Director.

Quality Considerations

Because the Chillum project was set-up for a short list of compounds per client instruction, the laboratory evaluated quality compliance for this specific list only. As a result, some of the compounds outside of the original list may be qualified. Below is a list of potential quality issues that may arise if the target compound list is expanded beyond the initial list:

- 1) Media cleanliness: Each sampling train was certified as clean to the required reporting limit for the project required short list only. Additional compounds not evaluated may not have met the required certification level, resulting in potential false positives or high bias in the associated sample results.
- 2) TO-15 QC samples: Before analyzing samples, the laboratory insures that the initial calibration, daily calibration standard, and laboratory control spike (LCS) meet acceptance criteria for the projects to be run on each TO-15 unit. Only the subset of compounds specified for Chillum was evaluated for compliance. Accuracy and precision as evaluated by the QC samples may not meet laboratory acceptance criteria for the extended list of compounds. Out of compliance QC will result in qualification of associated results.

Costs

Additional costs will be applied to cover the laboratory's labor. Our standard hourly charge is \$65/hour. To complete the three workorders from 2007, we estimate the labor required at six hours resulting in a charge of \$390. The eight workorders from 2005 are estimated to require 23.5 hours resulting in a reissue charge of \$1,527.50.

Regards,

Heidi Hayes
Technical Director
Air Toxics Ltd.